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RECENT IMPORTANT DECISIONS.

ADVERSE POSSESSION—TACKING SUCCESSIVE POSSESSIONS.—Plaintiff and the grantor of defendant constructed a fence on the supposed boundary line between their properties; the fence was so placed as to include part of plaintiff's land in the tract of defendant's grantor, whose deed to defendant, however, did not include the disputed tract. *Held*, the adverse possession of defendant and his grantor as to this disputed tract cannot be tacked. *Lake Shore & M. S. Ry. Co. v. Sterling* (Mich. 1915), 155 N. W. 383.

The question in this case is raised by the transfer of adjoining land by a deed which includes only such adjoining land and not the tract claimed by adverse possession. There is a conflict of authority as to whether such a deed is sufficient to supply such a privity in the disputed tract as to allow the adverse holdings of successive possessors to be tacked. The case is decided in accord with that which is probably the minority rule. See 11 MICH. LAW REV. 245.

BANKRUPTCY—STATE ACTS SUSPENDED BY FEDERAL ACT.—A debtor (engaged chiefly in farming) made an assignment for the benefit of his creditors, pursuant to a Pennsylvania statute which provided that the assignee under such an assignment should be entitled to set aside any preferential conveyance or any conveyance that could have been avoided by any of the creditors, and also provided that certain debts should be discharged by proceedings following the assignment. Plaintiffs, as assignees, sue to avoid a contract made by their assignor, which plaintiffs claim to be a fraudulent conveyance to defendants. *Held*, the assignees have no right to prosecute the suit, as the law under which they are acting is suspended by the National Bankruptcy Act. *Classer et al. v. Strawn* (1915), 227 Fed. 139.

The state statute in this case provided not only for the common law assignment by which the assignee stands "in the shoes of the assignor", but gave the assignee, in addition, the rights of creditors to set aside fraudulent conveyances. *Mayer v. Hellman*, 91 U. S. 496, 23 L. ed. 377, and *Boese v. King*, 108 U. S. 379, 27 L. ed. 760, (decided under the Act of 1867), would necessitate a holding that the assignment in the principal case was effective to pass title to the assignee, but leave open the question as to what effect is to be given to the other provisions of the statute. The District Court takes the view that the state statute is a bankruptcy act, and that, so far as it covers the same scope as the National Bankruptcy Act, it is suspended; that, as the National Bankruptcy Act extends to all natural, insolvent persons the privilege of becoming voluntary bankrupts, and as the assignment in the instant case was voluntary on the part of the insolvent assignor, the state statute is suspended, even as to farmers, regardless of the fact that farmers are exempted by the terms of the National Act from involuntary bankruptcy under its operation. *Rockville Nat. Bank v. Latham*, 88 Conn. 71. The holdings of the Pennsylvania Superior Court, that a state insolvency